

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION**

MDL No. 16-2738
Judge Freda L. Wolfson
Magistrate Judge Lois H. Goodman

Case No.: 3:16-MD-02738-FLW-LHG

**NOTICE OF MOTION OF
JOHNSON & JOHNSON AND
JOHNSON & JOHNSON
CONSUMER INC.'S
APPLICATION FOR
INJUNCTIVE RELIEF**

[ORAL ARGUMENT REQUESTED]

To: All Counsel of Record

PLEASE TAKE NOTICE that on a date and time to be set by the Court, defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (collectively, “J&J Plaintiffs”) shall move before this Court for an order granting a preliminary injunction pursuant to Fed. R. Civ. P. 65 and Local Rule 65.1 and a protective order pursuant to Fed. R. Civ. P. 26 whereby this Court will take constructive possession and control of certain historical artifacts owned and in the possession of the J&J Defendants and their counsel that may contain evidence related to the claims pertaining to Johnson’s® Baby Powder, maintaining the status quo until a procedure regarding the fair allocation among thousands of litigants in

these MDL actions and others across the country may be implemented regarding the need for destructive testing of the limited amount of materials that may be contained within the artifacts, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that the J&J Defendants intend to rely upon the Declaration of Kathleen Frazier, Esq. and exhibits thereto; the Brief in Support of Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Application for Injunctive Relief; the Proposed Order and Certificate of Service; and the pleadings and prior proceedings herein in support of this motion.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that Plaintiffs' opposition, if any, must be electronically filed and served upon all parties by August 23, 2017.

DRINKER BIDDLE & REATH LLP

Dated: August 16, 2017

By: /s/ Susan M. Sharko

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